

MAY/01 DRAFT	JUNE/01 COMMENTS	JULY/01 DRAFT	AUGUST/01 COMMENTS
1901-Definitions: 1. Customer 2. Customer Account Freeze 3. Letter of Agency 4. Slamming	Comments filed by: <ul style="list-style-type: none"> Accipiter Arizona Consumer Council AT&T Citizens Com. Copper Valley Cox Communications Valley Tele. Qwest Communications Southwestern Tele. Table Top Verizon Western Wireless WorldCom, Inc. AT&T: use Subscriber as FCC, to ensure people authorized by customer can make change. Qwest joined Rural LECs- define telecom services.	1901-Definitions: 1. Authorized Carrier 2. Complainant 3. Customer 4. Customer Account Freeze 5. Executing Tele-Carrier 6. Letter of Agency 7. Slamming 8. Subscriber 9. Telecommunication Company 10. Unauthorized Change	Comments filed by <ul style="list-style-type: none"> Accipiter Az Consumer Council AT&T Citizens Com. Copper Valley Cox Communications Valley Tele. Qwest Communications RUCO Southwestern Tele. Table Top Verizon Western Wireless WorldCom, Inc AT&T- Use Subscriber, Customer Account Freeze, Letter of Agency. Cox Com. Revise “customer” to include others.

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			<p>Rural LECs- Customer Account-Electronic Freeze.</p> <p>WorldCom- Typo.</p> <p>Qwest- Re-Written Rules provided.</p>
<p>1903 Application: Arizona jurisdictional companies.</p>	<p>WorldCom: Rules should closely mirror FCC.</p> <p>Verizon- Az law exempts wireless.</p> <p>Qwest- Adopt FCC consistent w/ARS 44-1572 and 44-1573.</p>	<p>Application: Telecom companies, wireless when required to provide equal access, or local number portability.</p>	<p>Verizon- Conditional Wireless Application contrary to Az Law.</p> <p>Rural LECs- Clarify-IXCs</p> <p>WorldCom- Typo</p> <p>Cox Com. Apply to Residential only.</p> <p>Qwest Strike Local Number Portability, use equal access.</p>
<p>1904-Company Change Procedures:</p> <ol style="list-style-type: none"> No change without authorization. Keep Record for 24 Months. No Customer Contact by Executing carrier. Execute change promptly, no liability for process of Unauthorized Change. Obtain authorization w/single contact. 	<p>Rural LECs- Executing Carrier should have no liability for change, it is not responsible for verification.</p> <p>Separate Authorization burdensome/Retain records for 6 months</p> <p>Cit. Com- 12 months is good enough</p> <p>Cox Com. Use “Promptly” for return, Separate authorization is burden, cost of Third Party Verification is \$15 per.</p>	<p>1904-Company Change Procedures:</p> <ol style="list-style-type: none"> No change without authorization Keep Record for 12 Months No Customer Contact by Executing carrier Execute change promptly, no liability for process of Unauthorized Change Obtain authorization w/single contact 	<p>Rural LECs- redundant, 24 months too long, 6 months OK, use “Executing Telecommunications Company.”</p> <p>AT&T give LEC liability, allow single authorization.</p> <p>WorldCom- use “authorized carriers.”</p>

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<p>1905 Verification</p> <ol style="list-style-type: none"> 1. Must be customer. 2. Written or Internet. 3. Voice recorded. 4. Independent Third Party verification. 5. Written is separate document, sole purpose is change, signed and dated. 6. Letter of agency, with check, customer notice, not contain promotional language. 7. Electronic Letter of Agency OK. 8. Voice record- confirm ID, authorized, requests change, with specifics w/Automatic Number Identification. 9. Three Way Call, Carrier rep required to drop off. 10. Third party- Independent, record ID, authorized, requests change, with specifics. 	<p>AT&T permit electronic Letter of Agency, allow “subscriber.” Allow marketing check to customer. Use FCC Automatic Number Identification language, Third Party Verification option issue. Eliminate 3 Way drop off requirement. (Comment joined by Rural LECs) Return of Slammed should be in accordance with 1905.</p> <p>WorldCom: Allow inducement, Third Party Verification, recording.</p> <p>Cox Com. Verification with Automatic Number Identification is burden.</p> <p>Arizona Consumer- allow rescission.</p>	<p>1905 Verification</p> <ol style="list-style-type: none"> 1. Written or Internet. 2. Voice recorded. 3. Independent Third Party verification. 4. Written is separate document, sole purpose is change, signed and dated. 5. Letter of Agency, w/check, customer notice, not contain promotional language. 6. Electronic Letter of Agency OK. 7. Voice record- confirm ID, authorized, requests change, w/ specifics. 8. Third party- Independent, record ID, authorized, requests change, W/specifics 	<p>Qwest delete written authorization/redundant.</p> <p>Rural LECS- revise to reflect Internet authorization, consistent w/electronic signature, “qualified rep.” Do not restrict inducement- allow Letter of Agency with promotional materials. 800 Number only if Recording Authorization.</p> <p>AT&T Clarify Internet v. Elect., restore language on electronic authorization.</p> <p>WorldCom- use FCC authorization options, keep “electronic” w/Internet.</p>
<p>1906 Notice of Change, Billing insert or bold notification of authorized change within 30 days, include name and address of new carrier.</p>	<p>AT&T use “authorized carrier”, not “Preferred.”</p> <p>Rural LEC-cost recovery for notice.</p> <p>WorldCom: FCC Truth in Billing requirements resolve. Billing Agent issues.</p> <p>Cit. Com- costs of notice, FCC Truth in</p>	<p>1906 Notice of Change, Billing insert or bold notification of authorized change within 30 days.</p>	<p>Rural LECs-concern with billing software capabilities, direct biller knowledge.</p> <p>AT&T restore “in the next bill” to follow FCC/Truth in Billing.</p> <p>Qwest don’t need ‘address’ use toll free numbers.</p>

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	Billing. Qwest- agent liability.		WorldCom- FCC Truth in Billing/direct billing.
1907 Unauthorized Changes 1. Unauthorized Carrier to take all action within 3 days of notice by customer. 2. Pay all charges to return customer to authorized carrier within 5 days. 3. Return any payments from first 30 days. 4. Remove unpaid charges. 5. Incurred if not paid for 60 days. 6. Forward Billing info to Authorized Carrier. 7. No disconnection.	AT&T use FCC, LEC controls, on “disconnect” issue ensure customer responsibility. Rural LEC- inadvertent change- revise “initiating “ to “submitting.” Customer needs time frame to report Slam. WorldCom- allow carriers to workout issue with customer. Qwest-timeframes are unreasonable, revise to reflect specific billing. Allow Qwest to file Credit Reports.	1907 Unauthorized Changes 1. Subscriber to notify Unauthorized Carrier within 60 days. 2. Unauthorized Carrier to take all action within control to return, 5 days. 3. Pay all charges with return. 4. Absolve charges incurred if not paid for 60 days. 5. Forward Billing info to Authorized Carrier, MAY bill for service at authorized rates. 6. Refund 150% of unauthorized Charges paid to the Authorized Carrier, for credit to subscriber’s authorized charges. 7. No disconnection during Slam dispute. 8. Customer to pay all charges not in dispute. 9. Retain record for 12 months.	Qwest remove 5 business days, use “promptly” let us report to credit reporting. Rural LECs include “from date of Customer Notice.” Concern with payment of non-disputed charges. WorldCom- positive changes made to rules, yet inconsistent with FCC. AT&T use FCC, insert “alleged” don’t require re-rating, allow customer to choose re-rating or proxy refund.
1908 Notice of subscriber rights. 1. Provide each subscriber, as new customer, in telephone Directory, on Website.	AT&T- Annual notice should be in Directory. Rural LECs- clarify notice requirements. LEC should not be required to offer freeze.	1908 Notice of subscriber rights. 1. Provide each subscriber, as new customer, in telephone Directory, on Website.	Rural LECs Single notice for both 1900/2000, don’t require discontinued services. AT&T insert “available,” require customer complaint to ACC.

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2. Includes Contact Info. 3. Description of prohibitions. 4. Remedies. 5. Reporting.	WorldCom: Notice should only apply to LECs. Cit. Com- Already publish these rights. Cox Com.. Annual notice not needed, permit all authorizations.	2. Includes Contact Info. 3. Description of prohibitions. 4. Remedies. 5. Reporting.	Qwest-Don't require customer to contact ACC. Impose publishing in directory requirement on all. WorldCom- Unclear if IXC should provide notice.
1909 Account freeze , Local Exchange Carrier to offer on nondiscriminatory basis, separate authorization, confirmed, no charge, maintain record for 24 months.	AT&T ACC should permit all methods to get Account Freeze. Rural LEC- LEC should not be required to offer freeze, but allowed to charge. Qwest Don't require written authorization, allow Third Party Verification.	1909 Account freeze, LEC to offer on nondiscriminatory basis, separate authorization, confirmed, no charge, maintain record for 12 months.	Rural LECs- include Local Freeze. AT&T freeze only Intra/Inter services, allowing local service Account Freeze would inhibit competitive. Accept Three-Way Conference Call removals. Qwest prohibiting marketing of Customer Account Freeze beyond FCC requirement with First Amendment issue.
1911 Compliance and Enforcement If ACC finds violation, ACC may impose penalties. Penalties are in addition to all other causes of action, remedies and penalties.	Rural LEC's- Fines exceed ACC limit Qwest concern w/ innocent mistakes.	1911 Compliance and Enforcement If ACC finds violation, ACC may impose penalties. Penalties are in addition to all other causes of action, remedies and penalties.	Rural LECs: Clarify record keeping requirements, ensure ACC has Hearing requirement before penalty. WorldCom- Inconsistent with 1905 record keeping issue.
No Waiver	No Comment	No Waiver	Rural LECs- ACC should create Waiver similar to 800 section.